

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE GAS AND	)	
ELECTRIC COMPANY FOR AN ADJUSTMENT OF ITS	)	CASE NO.
ELECTRIC AND GAS RATES AND FOR CERTIFICATES	)	2016-00371
OF PUBLIC CONVENIENCE AND NECESSITY	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO JBS SWIFT & CO.

JBS Swift & Co. ("JBS Swift"), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies in paper medium and an electronic version of the following information. The information requested herein is due no later than March 31, 2017. Responses to requests for information in paper medium shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

JBS Swift shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which JBS Swift fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, JBS Swift shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. State under what electric and gas rate schedules JBS Swift is currently served by Louisville Gas and Electric Company (“LG&E”).

2. Refer to the Direct Testimony of Eric Wallin (“Wallin Testimony”) at page 3, lines 16–22.

- a. State whether JBS Swift currently owns generation facilities. If so, provide details concerning the facilities.

- b. State whether the referenced local disturbances are caused by LG&E system outages or if they are outages on JBS Swift-owned equipment.

c. Explain the statement beginning on line 20 regarding the credits offered under the Curtailable Service Rider ("CSR") to partially offset the cost of generators to protect against unexpected local outages.

d. Explain whether JBS Swift is aware that LG&E's CSR is designed to provide credits to customers who are able to curtail a portion of their load when called upon by LG&E, after being given notice, and that credits would not necessarily apply to the temporary outages described in the Wallin Testimony.

3. Refer to the Wallin Testimony at page 4, lines 9–16. Provide JBS Swift's current daily and annual natural gas usage, and the expected incremental daily and annual natural gas usage resulting from the installation of natural gas-fired generation.

4. Refer to the Wallin Testimony at page 5, lines 5–8. State whether JBS Swift anticipates that its natural gas generation needs will meet the threshold volumetric requirements of LG&E's Firm Transportation tariff, which requires usage of at least 50 Mcf per day per delivery point.

5. Refer to the Wallin Testimony, page 5, line 11, through page 6, line 7. Provide a more detailed explanation of the non-firm back-up service JBS Swift is requesting on page 5, and clarify the position of JBS Swift on page 6 with regard to whether it objects to LG&E's proposal to eliminate the Supplemental or Standby Service Rider SS.

DATED MAR 17 2017

cc: Parties of Record



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